

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED

DOC#

DATE FILED:

9/29/15

In re Applications of:

LEHMAN BROTHERS SPECIAL FINANCING INC.,
for an Order Pursuant to 28 U.S.C. § 1782 to Conduct
Discovery from The Goldman Sachs Group, Inc., UBS
Americas Inc. and Deutsche Bank USA Corporation for
Use in a Foreign Proceeding.

Misc Action Nos. 15 Misc. 294
15 Misc. 295
15 Misc. 296

STIPULATION AND [PROPOSED] ORDER

WHEREAS, Lehman Brothers Special Financing Inc. ("LBSF") filed its Petitions and Applications for an Order Pursuant to 28 U.S.C. § 1782 to Conduct Discovery from The Goldman Sachs Group, Inc., UBS Americas Inc. and Deutsche Bank AG (named here as Deutsche Bank USA Corporation) (together, the "Respondents") for Use in Foreign Proceedings (the "Applications") on September 14, 2015;

WHEREAS, the Applications attach the Declarations of Brijesh P. Dave, dated September 14, 2015, which enclose the subpoenas LBSF seeks leave to serve upon the Respondents as Attachment B (the "Subpoenas"); and

WHEREAS, the Respondents do not oppose LBSF serving the Respondents with the Subpoenas;

WHEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between LBSF and the Respondents, through their respective undersigned counsel, the following:

1. LBSF may serve Respondents with the Subpoenas;
2. Respondents do not waive, but to the contrary, expressly reserve all rights and objections with respect to the Subpoenas, including without limitation all objections based upon applicable laws, rules, doctrines, immunities, assertions

of privilege or that any requests for production are beyond the scope of permissible discovery under 28 U.S.C. § 1782, and LBSF does not waive, but to the contrary, expressly reserves all rights to challenge any objection or assertion of privilege; and

3. Each of the Respondents shall respond and/or object to the Subpoena within fifteen (15) days from its date of service unless otherwise agreed by the parties.

Dated: New York, New York
September 28, 2015

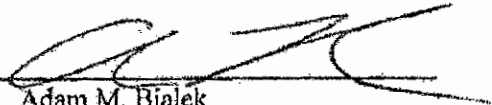
CLEARY GOTTlieb STEEN & HAMILTON
LLP

By: 
Carmine D. Boccuzzi Jr.

One Liberty Plaza
New York, New York 10006
(212) 225-2000
(212) 225-3999 (facsimile)
cboccuzzi@cgsh.com

Attorneys for The Goldman Sachs Group, Inc.

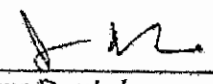
WOLLMUTH MAHER & DEUTSCH LLP

By: 
Adam M. Bialek

500 Fifth Avenue
New York, New York 10110
(212) 382-3300
(212) 382-0050 (facsimile)
abialek@wmd-law.com

*Attorneys for Lehman Brothers Special
Financing Inc.*

MORGAN, LEWIS & BOCKIUS LLP

By: 
Joshua Dorchak

101 Park Avenue
New York, New York 10178
(212) 309-6700
(212) 309-6001 (facsimile)
joshua.dorchak@morganlewis.com

*Attorneys for UBS Americas Inc. and
Deutsche Bank AG, named here as Deutsche Bank USA Corporation*

SO ORDERED:


U.S.D.J.

9/29/15

SO ORDERED

Judge John G. Koeltl

Dated: September __, 2015